

1: JV 00-1807

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA7  
10/17/00  
TAMatthew Dix,  
Plaintiff

Civil Action

vs.

No. \_\_\_\_\_

MARTIN F. HORN, SECRETARY;  
 WILLIAM A. HARRISON, J. HARVEY  
 BELL; and ROBERT S. EITNER, (D.O.C.);  
 BEN VARNER, SUPERINTENDENT,  
 BARNETT; and T. Stachelech, (SCI-  
 LILLAS); FRANK D. GRILLIS,  
 SUPERINTENDENT; KANDIS K. CASANO;  
 BERNON L. LANE; ROY E. JOHNSON  
 AND KASKIE, (SC - Coal Township);  
 JOSEPH CHENSEY, SUPERINTENDENT;  
 ROBERT SHANNON, and E. K. SMITH,  
 (SCI - FRACKVILLE),

Defendants

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SEP 29 2000

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FILED  
SCRANTONMotion For Appointment Of Counsel OCT 12 2000

Plaintiff Matthew Dix, Pursuant to 18 U.S.C. § 3606(a) and or 42 U.S.C. § 1915(d), Requests this Court to appoint counsel to represent him in this case for the following reasons:

1. Plaintiff is not able to afford counsel.
2. The issues involved in this case are complex and for thus:

(a). Fact that challenges rest conspiracy and scheme undergoing a chronology of events of betrayal whereby a person is either injured in his person or property or deprived of any right or privilege of a citizen of the United States.

(b). The large number of defendants of whom are supervisory officials, presents complex legal issues in determining which should sufficiently and personally be held liable involved the constitutional violations.

(c). the sheer number of claims and defendants makes this a factually complex case.

(d). Plaintiff's inability to investigate.

(e). Fact that medical testimony may be necessary.

(f). Plaintiff's request for a jury trial.

3. Plaintiff are currently confined in a segregated housing unit (RHU) restricted housing unit (RC) administrative custody and so has been since time arrival prison (SCID) July 13, 2000, from transfer another.

4. As stated in paragraph 13, lines 12 through 16. Plaintiff confinement as pretext for punitive purpose are required to live under conditions thereof wherefore prison limits the hours that he may have access, if any, to the (R) mini Law Library.

5. Legal material contained therein are "far less limited" and inadequate, close to none for which prisoners housed have recently exercise a 3 to 5 days hunger strike in protest as well other wrongs continue and ongoing. Denied two prisoner's participation attendant at same time, nor an alternative system available which may enable prisoners legal assistance by other means as certified paralegal. And Plaintiff are denied court access due to prison official refusal/denial to provide him writing utensil upon termination pen/pencil, namely pens when ink run-out or dullness required sharpen or replace pencil; unable to obtain photo-copy, etc..

6. The end of justice would best be served in this case if an attorney was appointed to represent the Plaintiff.

Dated: 9/19/2000

  
Attorney # 00-1857